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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

November 30, 1994



Linda McClain
Assistant Manager
Environmental Restoration Division
U.S. Department of Energy
P.O. Box 550, H4-83
Richland, Washington 99352

Re: Expectations for 100 Area Focused Feasibility Studies and
Proposed Plans

Dear Ms. McClain:

This letter is in regard to the U.S. Environmental Protection Agency's (EPA) and the Washington State Department of Ecology's (Ecology) expectations for information to be presented in the focused feasibility studies and proposed plans for the upcoming 100 area decisions.

The U.S. Department of Energy (DOE), EPA, and Ecology have been working on the feasibility studies and proposed plans for the last several months. Initially, DOE had included a single exposure scenario, occasional use (recreational), in the cleanup documents. Through the work done over the last several months, all the parties have agreed that the focused feasibility studies and proposed plans should contain a range of exposure scenarios. These include both an occasional use scenario, a frequent use (residential) scenario, and remediation of the full extent of contamination to background.

The EPA and Ecology recommend that the preferred alternative for the initial 100 proposed plans addressing high priority sites that received liquid radioactive wastes be a removal/transport and dispose option. As a sub-tier of this preferred alternative, EPA and Ecology recommend the DOE develop tables to delineate the costs and volumes associated with each of the exposure scenarios. An example of the table is on page 4. In addition, tables for preliminary remediation goals for the different exposure scenarios should be established.

Cleanup scenarios for the 100 area should include the following:

- Cleanup to an occasional use (recreational) scenario at a risk level of $10E-4$ to a depth of 10 feet. Beneath 10 feet, clean up levels should be established which are protective of a recreational usage of groundwater.

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- Cleanup to an occasional use (recreational) scenario at a risk level of $10E-6$ to a depth of 10 feet. Beneath 10 feet, clean up levels should be established which are protective of a recreational usage of groundwater.
- Cleanup to a frequent use (residential) scenario at a $10E-4$ risk level.
- Cleanup to a frequent use (residential) scenario at a $10E-6$ risk level.
- Frequent use (residential) cleanup scenario should proceed to a depth where there is a clear delineation between contaminated and clean material at both the $10E-4$ and $10E-6$ risk levels.
- Additionally, the residential risk scenarios should be evaluated for consideration of MTCA compliance at a depth of fifteen feet.
- The final scenario should be the bounding case of cleaning up the full extent of contamination to background level.
- All of the various human risk scenarios should be evaluated allowing for radioactive decay to the year 2018.

The documents must also address protection of ecological resources. This includes both ecologically driven cleanups where human health risks would not have triggered cleanup actions, and the ecological consequences (site disturbance) resulting from cleanup actions. Ecological cleanup thresholds will be based on ecological state and federal risk standards (chronic or acute hazard quotient). The documents should clearly delineate any waste sites that require cleanup due to an ecological risk.

Please note that although the feasibility studies and proposed plans will have these various exposure scenarios, the primary focus of the detailed comparative analysis should be on the clean up alternatives.

Several months ago, EPA and Ecology indicated that the first focused feasibility studies and proposed plans should address only sites that received radioactive liquid effluents. Burial grounds or other miscellaneous waste sites that had been carried through the feasibility study will be addressed in subsequent

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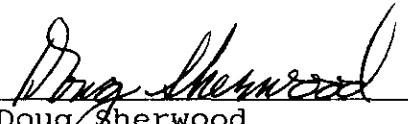
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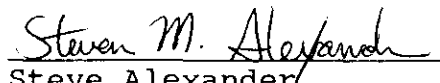
proposed plans. Please note this determination should not require DOE to bring forward any waste sites that had not previously been identified in the limited field investigation report.

As we discussed, EPA and Ecology have agreed to a schedule for real time working sessions with DOE and its contractors to revise the feasibility studies and proposed plans in lieu of a formal comment, comment response and revision process. The final documents will reflect revisions made during the working sessions. It is our intent to have the final documents ready for public comment no later than January 23, 1995.

Please feel free to contact Doug Sherwood of EPA at (509) 376-9529 or Steve Alexander of Ecology at (509) 736-3045.

Sincerely,


Doug Sherwood
Hanford Project Manager


Steve Alexander
Perimeter Section Manager

Enclosure

cc: Julie Erickson, DOE
Greg Eidam, BHI
Joe Stohr, Ecology
Nancy Werdel, DOE
Administrative Record (100 Area Generic)

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Alternatives	Occasional 10E-4	Occasional 10E-6	Frequent 10E-4	MTCA 15 Feet	Frequent 10E-6	MTCA 15 Feet	Full Remediation Background
No Action							
Deed Restriction							
Removal							
etc							
etc							